, 0	ements of the NESHAP for the Pulp and Paper Production Source C	Category F	roc	ess						1
peration	ons		1	1						
	# pulping lines	(A)		(B)	(C)	(D)	(E)	(F)		_
	# bleaching lines	Number of		EPA	Tech	Managemen t	Clerical	EPA		
	# mills total	Responden ts		Hours	Hours	Hours	Hours	Cost		
	# mills with bleaching lines	Per Year	(a)	Per Responden t	@ \$28.08	Per Year @ \$51.95	Per Year @ \$20.85	Per Year		
	Burden Item			-	(C=AxB)	(D=Cx0.05)	(E=Cx0.1)			1
. Aj	pplications									
. Su	urveys and Studies									
. Re	eporting Requirements									
A.	. Read and Understand Rule Requirements	1	b	40	40	2	4	\$1,310		
В.	. Required Activities									
	Initial performance tests:									
	1.1) Pulping processes (Non-Sulfite) - Choice of:									
	a) Review Documentation that vent streams are introduced to	5	bc	8	40	2	4	\$1,310		
	the flame zone of a boiler, lime kiln, or recovery furnace, or									
	b) Review documentation that the control incinerator is operating	1	b d	8	8	0	1	\$262		
	at a level of at least 1600 F and 0.75 sec residence time, or									
	c) Review performance test of control device	1	b d	8	8	0	1	\$262		
	1.2) Pulping Processes (Sulfite)	1	be	8	8	0	1	\$262		
	-Revew performance test of control device 2.1) Bleaching process vent scrubber (MACT I Mills) - Choice									
	of									
	a) Review documentation of scrubber operating parameters		bg			2		\$1,048		
	b) Review performance test of control device		bf	8	0	0	0	\$0		_
	2.2) Bleaching process vent scrubber (MACT III Mills) - Choice		<u>.</u>		_	_	_	4-		
	a) Review documentation of scrubber operating parameters		bg		0	0		\$0		
	b) Review performance test of control device		bf	8	0	1	0	\$52		_
	3.1) Pulping wastewater treatment system (Non-Sulfite) - Choic							** **		_
	a) Review performance test of condensate segregation and	4	bg	8	32	2	3	\$1,048		_
	control device, or			_						_
	b) Review performance test of biotreatment unit	40	bg	8	320	16	32	\$10,484		_
	3.2) Pulping wastewater treatment (Sulfite)		<u>.</u>		_	_				
	-Review performance test of control device	1	bg h	8	8	0	1	\$262		
	Review repeat performance tests									
	1) test method 308 - pulping	0	_	4	0	0	0	\$0		
	2) test method 26A - bleaching	0	bi	4	0	1	1	\$73		
	3) test method 305 - kraft pulping wastewater	1	bi		4	0	0	\$131		
	4) test method 304 - kraft pulping wastewater	0	-		0	0	0	\$0		
	5) test method 305 - sulfite pulping wastewater		bi					\$52		
	Initial/Annual inspection (enclosures, closed vent,	103	j	0	0	0	0	\$0		
	wastewater conveyance system)- test method 21									
	Monthly visual inspection of enclosures, closed	155	k	0	0	0	0	\$0		
	vent system, and wastewater conveyance system.									
\perp				-					_	4
	(continued). Annual Agency Burden and Cost of Recordkeepi ements	ing and Rep	ortii	ng						
чине	of the NESHAP for the Pulp and Paper Productio	n Source C	otec	ory - Proces	e Operation	1				+
	of the meation for the rulp and raper rioductio	ii boulce Ci	acg	ory Floces	o operation	1.9				+-

		# bleaching lines	Number		EPA		Managemen	Clerical	EPA			
		# mills total	of Responden ts		Hours	l Hours	Hours	Hours	Cost			
		# mills with blooding lines	Per Year	(0)	Per	Don Voor	Per Year	Don Voor	Don Voor			
		# mills with bleaching lines	rei ieai	(a)	Responden t	Per Year @\$28.08	@ \$51.95	Per Year @ \$20.85	Per Year			
		Burden Item			(r)	(C=AxB)	(D=Cx0.05)	(E=Cx0.1)	(s)			
		Create Information										
		Gather Information										
	E.	Report Preparation										
		Review Initial Notification Report		bk	4	0	0	0	\$0			
		Review Notification of compliance status		bk	4	0	0	0	\$0			
		Review initial compliance strategy report	0	_	4		0	0	\$0			
		Review compliance strategy report update	31		4	124	6	12	\$4,063			
		Review Semi-annual summary report	162	k	2		16	32	\$10,615			
		Review Continuous monitoring/Exceedance reports	24	m	8	192	10	19	\$6,290			
		Review Notification of performance test	28	b n	8	224	11	22	\$7,339			
		Review Notification of construction/reconstruction	23	b o	4	92	5	9	\$3,014			
		Review Notification of anticipated startup	23	b o	4	92	1	1	\$2,656			
		Review Notification of actual startup	23	b o	4	92	1	1	\$2,656			
4.	Rec	ordkeeping Requirements										
	A.	Read Instructions										
	B.	Plan Activities										
	C.	Implement Activities										
	D.	Develop Record System	0	bk	0	0	0	0	\$0			
		Record information										
		Records of monitoring parameters	162	с	0	0	0	0	\$0			
		Records of periodic inspections (monthly										
		visual inspections and annual method 21)										
		Record startups, shutdowns, and malfunctions	162	с	0	0	0	0	\$0			
	F.	Personnel Training										
		Time for audits										
	H.	Litgation		р		4160	208	416	\$136,292			
		Total:			194	1640	130	170	\$189,483			
		TOTAL FEDERAL GOVERNMENT BURDEN										
		SUMMARY:										
		Total Hours:	1,939									
		Total Cost:	\$189,483									
		Average Annual Hours:	646									
		Average Annual Cost:	\$63,161									
H	7			\vdash								
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		11. 12. 12. 12. 12. 12. 12. 12. 12. 12.		-								
a Val	ues	are rounded to simplify calculations.										
b On	e-tii	me activity. In out years, after initial compliance date, assume	that 5% of m	nills	affected as a	result of ur	nexplained ex	ceedances.				
c Est	ima	ted that 66.7% of mills will use a recovery boiler, power boiler, o	or lime kiln fo	or p	ulping lines.	There are 1	41 non-sulfite	pulping mill	s. (66.7% of 14	1 = 94)		
d Est		ted that 33.3% of mills will use incineration for pulping lines (16	5.7% will pro	vide	accepatble of	lesign spec	s (24), and 16	.7% will cond	luct performan	ce tests		
(2.7)												
e As	sum	e that 5% of the 14 sulfite pulping mills will conduct performan	ce tests (14)	x .05	5 = .7 (round	ed to 1)).						

																ı
£ 97	MACT I category mills have bleach	ning lines 00% will provide	accontable no	rformar	100 cr	200 (79)	1004	will conduc	ot parforma	200						
tests		ning inies. 90% win provide	ассертавіе ре	Hommai	ice sp	iecs (76),	1070	wiii conduc	л репоппа	lice						
Ass result	sume 2 percent of stand-alone MA ts (6)	CT III category mills have b	leaching lines	(2% of	338=	7). 90%	will p	provide perfo	ormance sp	ecs of	previous t	test				
10%	6 will conduct performance tests (1).														
g Est	timated that each kraft mill has one	pulping wastewater control	device. Of the	ne 123 k	raft n	nills, 32 a	lread	y have stear	n strippers	in use	·,					
and	of the 32, 16 assumed to test, 16 a										•	d 51 will	install s	team		
stripp	pers. Filities installing new biotreatment of	control or new steam strippe	re are accume	d to ner	form	initial ne	rform	nance tests								
Tac	indes histaining new biotreatment c	ontroi of new steam surppe	is are assume	u to per	101111	iiittai pei	110111	lance tests.								
h Est	timated that each kraft mill has one	pulping wastewater control	I device. Ass	imed 33	8% w	ill use bio	treati	ment. (33%	of							
i Ass	sumed that 15% of performance te	sts are failed and need to be	repeated.													
	ial and annual activity by all affect i=103).	ed mills. Assumed that EPA	A is notified e	ach year	of th	e testing.	As	sumed 2/3 o	of all MACT	ΓI mil	lls have po	sitive pres	ssure p	oints in	their vent sys	stems(2/3
X 133	,-103).															
k Pei	rformed by all affected mills. (162)															
l Pe	rformed by all kraft mills (123)															
					L.							24.42				
m As = 24)	ssumed that 15% of all mills during	g any one quarter will be req	urred to subn	nt an ex	ceed	ance repo	rt in	addition to t	ine summai	ry rep	ort. (15%	01 162				
n EF 542)	PA must be notified of all tests incl	uding repeat performance to	ests. (155 x 1.	15 x 3 +	7 x 1	.15 =										
5.2)																
o As = 24)	sumed 15% of mills conduct const	ruction or reconstruction pe	er year. (15%	of 162												
	sumed 2 yearly full time equivalen		$2 \times 40 = 4160$	hours/y	ear).											
Table	1. Annual Respondent Burden an NESHAP for Pulp and Paper															
	(40 CFR Part 63, Subpart S)		(A)	(B))			(C)	(D)		(E)	(F)		(G)	(H)	
	# bleaching lines		Hours Per	Numb	er of	Emissio	ons	Hours	Number	rof	Technica	Manager	me C	erical	Total	
	# mills total		Occurrence	Occur		Testin		Per	Responde	ents	Hours	Hours	s F	lours	Cost	
	# mills with bleaching lines		(Technical	Pe	r	Per	I	Responden	Per Yea	r (a)	Per Year	Per Yea	ar Pe	r Year	Per Year	
-			hours)	Respoi	nden	Occurre	enc	t Per Year			@\$64.60	@\$95.3	32 @:	\$40.09		
\bot			,	t		e										
1 A	Burden	Item	Not ap	Per Y	ear			(C=AxB)			(CxD)	(Ex0.05	5) (E	(x0.1)		
	urveys and Studies		Not ap													
	eporting Requirements		2.00 40													
	Read and Understand Rule Requ (b)		40		1		\$0	40	7		280		14	28	\$20,545	
	Read and Understand Rule Requ (b)	irements (MACT III Mills)	20		1		\$0	20	0	c,d	0		0	0	\$0	
	Required Activities															
\perp	1.1) Pulping processes (Non-Su	(Eta)	I	1			-[
	,pg p	inte)						24	4	c,e	96		5	10	\$7,044	
+	a) Provide documentation that introduced to	vent streams are	24		1		\$0			-,-						
#	a) Provide documentation that introduced to the flame zone of a boiler, li	vent streams are me kiln, or recovery furnace	e, or							.,.	60		3	6	\$4 402	
#	a) Provide documentation that introduced to	vent streams are me kiln, or recovery furnace			1		\$0	60		c,f	60		3	6	\$4,402	
	a) Provide documentation that introduced to the flame zone of a boiler, li b) Provide documentation that operating at a minimum level of 1600	vent streams are me kiln, or recovery furnace the control incinerator is F and 0.75 sec residence tim	e, or 60 ne, or		1	the first	\$0	60	1	c,f						
	a) Provide documentation that introduced to the flame zone of a boiler, li b) Provide documentation that operating	vent streams are me kiln, or recovery furnace the control incinerator is F and 0.75 sec residence tim	e, or 60			\$14,0	\$0		1	.,.	60		3	6	\$4,402 \$1,761	
	a) Provide documentation that introduced to the flame zone of a boiler, li b) Provide documentation that operating at a minimum level of 1600 c) Performance test of control 1.2) Pulping Processes (Sulfite)	vent streams are me kiln, or recovery furnace the control incinerator is F and 0.75 sec residence tin device - test method 308	e, or 60 ne, or		1	\$14,0 \$14,0	\$0	60	1	c,f						
	a) Provide documentation that introduced to the flame zone of a boiler, li b) Provide documentation that operating at a minimum level of 1600 c) Performance test of control 1.2) Pulping Processes (Sulfite)	went streams are me kiln, or recovery furnace the control incinerator is F and 0.75 sec residence tin device - test method 308 device - test method 308	e, or 60		1		\$0	60	1	c,f c,f, g c,g,	24		1	2	\$1,761	
	a) Provide documentation that introduced to the flame zone of a boiler, li b) Provide documentation that operating at a minimum level of 1600 c) Performance test of control 1.2) Pulping Processes (Sulfite)	went streams are me kiln, or recovery furnace the control incinerator is F and 0.75 sec residence tin device - test method 308 device - test method 308 bber (MACT I Mills) - Choi	e, or 60		1		\$0	60	1	c,f, g c,g, i	24		1	2	\$1,761	

	b) Performance test of scrubber or control device	24	1	\$10,000	24	0	c,g,	0	0	0	\$0	
				,			j				30	
	- test method 26A											
	2.2) Bleaching process vent scrubber (MACT III Mills) - Che											
	a) Provide documentation of scrubber operating parameters,	60	1	\$0	60	0	c,j	0	0	0	\$0	
	or previous performance test results, or											
	b) Performance test of scrubber or control device	24	1	\$10,000	24	0	c,g, j	0	0	0	\$0	
	- test method 26A											
	Pulping wastewater treatment (Non-Sulfite) Performance test of condensate segregation and	24	1	\$16,000	24	4	c,h,	96	5	10	\$7,044	
T	control device (test method 305), or											
	b) Performance test of biotreatment unit - test method 304	24	1	\$11,000	24	2	c,h,	48	2	5	\$3,522	
	3.2) Pulping wastewater treatment (Sulfite)											
	Performance test of control device - test method 305	24	1	\$16,000	24	0	c,h, m	0	0	0	\$0	
	Repeat of performance test											
	1) test method 308 - pulping	24	1	\$14,000	24	0	c,g,	0	0	0	\$0	
	2) test method 26A - bleaching	24	1	\$10,000	24	0		0	0	0	\$0	
	3) test method 305 - kraft pulping ww	24	1	\$16,000	24	1	c,h,	24	1	2	\$1,761	
t	4) test method 304 - kraft pulping ww	24	1	\$11,000	24	0	c,h,	0	0	0	\$0	
	5) test method 305 - sulfite pulping ww	24	1	\$16,000	24	0	c,h,	0	0	0	\$0	
	Initial/Annual inspection (enclosures, closed vent,	8	1	\$3,000	8	87	0	696	35	70	\$51,069	
$^{+}$	wastewater conveyance system)- test method 21	4	12	\$0	48	130	d	6,240	312	624	\$457,860	
	Monthly visual inspection of enclosures, closed	4	12	\$0	46	130	u	0,240	312	024	\$437,000	
С	vent system, and wastewater conveyance system. Create Information	Included	l in 3.B									
D	Gather Information	Included	1 in 3.B									
E	Report Preparation											
	Initial Notification Report	16	1	\$0	16	0	c,d	0	0	0	\$0	<45 day after promul.
T	Notification of compliance status	16	1	\$0	16	0	c,d	0	0	0	\$0	promun
	Initial Compliance Strategy Report	40	1	\$0	40	0		0	0	0	\$0	
	Compliance Strategy Report Update	16	1	\$0	16	27	р	432	22	43	\$31,698	
	Semi-annual summary report	16	2	\$0	32	137	d	4,384	219	438	\$321,676	
	Continuous monitoring/Exceedance reports	24	2	\$0	48	21	q	1,008	50	101	\$73,962	
	Notification of performance test	4	1	\$0	4	24	c,r	96	5	10		>75 day before
	Notification of construction/reconstruction	4	1	\$0	4	21	c,s	84	4	8	\$6,164	>180day beforeh nd
	Notification of actual startup	4	1	\$0	4	21	c,s	84	4	8	\$6,164	
R	ecordkeeping Requirements											
A	Read Instructions	Included	l in 3.A									
B	Plan Activities	Included	1 in 3.B									
C	Implement Activities	Included	l in 3.B									
D	Develop Record System	40	1	\$0	40	0	c,d	0	0	0	\$0	
E	Record information											
	Records of continuous monitoring for operating parameters	2	52	\$0	104	137	d	14,248	712	1,425	\$1,045,447	
	Records of periodic inspections (monthly	Included	l in 3.B		-							
	visual inspections and annual method 21)											
1 -	Record startups, shutdowns, and malfunctions	4	12	\$0	48	137	d	6,576	329	658	\$482,514	1

	F	Personnel Training	Not app	licable									
	G ′	Fime for audits	8	2	\$0	16	137	d	2,192	110	219	\$160,838	
		Total:							36,908	1,845	3,691	\$2,708,12 4	
		TOTAL INDUSTRY BURDEN SUMMARY:											
		Total annual labor hours	42,444										
		Annual costs in dollars	\$2,708,124										
		Annual costs in donais	\$2,700,124										
Foc	otno	tes											
		es are rounded											
		CT I Mills include kraft, sulfite, soda, and semi-chemical oper	rations. MAC	T III Mills in	clude mecha	nical, non-w	ood, and sec	conda	rv fiber or	erations.			
		time activity. In out years, after initial compliance date, assu											
		ormed by all mills. (130 MACT I Category Mills, 338 Stand-				инслужи	- CACCOUNT						
		me all MACT I category mills will be affected by this rule.				ills that will l	he affected l	ov thi	s rule are f	he stand-alon	e mills wit	h chlorine ble	eaching
		ilable information estimates that only 2% of stand-alone MA						•					
		pacted.))	ic i iii catego	ry minis nave	cinornic oice	ichnig proces	33C3 (270 01	JJ0 –	- 7, Alter II	iniai compiia	nee assessi	ment 331 mm	is arc
Т	otal	number of mills affected by this rule is $130 + 7 = 137$											
e E	estin	nated that 66.7% of mills will use a recovery boiler, power bo	oiler, or lime k	iln for contro	ol of pulping	vents. There	are 122 nor	-sulfi	te pulping	mills. (66.7%	of 122 = 8	31)	
f Estimated that 33.3% of mills will use incineration for pulping lines (16.7% will provide acceptable design specs (14), and 16.7% will conduct performance tests (14))													
g E	estin	nate includes test plan, test report, and parametric montioring	g setup. Meth	od 308 tests	for pulping li	nes and metl	nod 26A tes	ts for	bleaching	lines.			
h E	Estin	nate includes test plan, test report, and parametric monitoring	g setup. Meth	od 304 and 3	305 are for wa	astewater stre	eams.						
		me that all 8 sulfite pulping mills will conduct performance t	•										
j 9	4 M	ACT I category mills have bleaching lines. 90% will provide	acceptable pe	rformance s	pecs or previ	ous test resul	ts (85), 10%	will	conduct pe	erformance te	ests (9)		
Α	Assu	me 2 percent of stand-alone MACT III category mills have b	leaching lines	(2% of 338=	=7). 90% wi	l provide acc	eptable per	forma	ince specs	or previous to	est results ((6)	
10)% '	will conduct performance tests (1).											
		nated that each kraft mill has one pulping wastewater control	device. Of th	e 108 kraft r	nills, 28 alrea	dy have steam	m strippers	in use	·				
		of the 28, all are assumed to conduct condensate segregation								t control			
		45 will install steam strippers. Facilities installing new steam											
		ites installing new biotreatment control will perform initial pe											
		nated that each kraft mill has one pulping wastewater control			ill use biotrea	tment. (33%	of 108 = 36	5) Per	r footnote	"c." 5 % of 3	6= 2.		
		me sulfite mills will monitor gas scrubber parameters and us											
		med that 15% of performance tests are failed and need to be											
o I	nitia	l and annual activity. Assumed that EPA is notified each ye	ar of the testir	ig. Assumed	1 2/3 of all M	ACT I mills l	nave positive	e pres	sure point	s in their vent	systems		
		vill have to test using method 21 (2/3 x 130 = 87).							•		_		
		me that 25% of all kraft mills are still required to submit con	npliance strate	gy reports (2	25% of 108 kr	aft mills = 27	affected kr	aft m	ills) in orde	er to comply	by 2006.		
_		med that 15% of all affected mills during any one quarter wi	•								•		
		must be notified of all tests including repeat performance te	•			_							
		med 15% of all affected mills conduct construction or recon-					1						
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